

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
MICHAEL ALEMAN-VALDIVIA and FREDDY SANCHEZ,
individually and on behalf of all others similarly situated,

Civil Action No.
1:20-cv-00421-LDH-PK

Plaintiffs,

-against-

TOP DOG PLUMBING & HEATING CORP., FIRST CHOICE
PL, INC., VERONICA AZULAI, and RON MAIMON
AZULAI,

Defendants.

-----X
**DECLARATION OF KATHERINE MORALES IN SUPPORT OF
PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION,
COURT-AUTHORIZED NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA,
AND EXPEDITED DISCOVERY**

I, Katherine Morales, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an associate with Katz Melinger PLLC, attorneys for plaintiff Michael Aleman-Valdivia¹, and I am familiar with all of the facts and circumstances of this action. I make this declaration in support of Plaintiff's Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) of the FLSA and Expedited Discovery.
2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's proposed Order granting conditional collective certification, court-authorized notice, and expedited discovery.
3. Attached hereto as **Exhibit B** are true and correct copies of English and Spanish versions of Plaintiff's proposed Court-Authorized Notice of Lawsuit Regarding Unpaid Wages.

¹ Plaintiff Freddy Sanchez remains a plaintiff in this matter however based on his job and job duties, he is not part of the collective motion or the collective class of plaintiffs.

4. Attached hereto as **Exhibit C** are true and correct copies of English and Spanish versions of Plaintiff's proposed Reminder Postcard.
5. Attached hereto as **Exhibit D** is a sample of employee work schedules produced by Defendants as pre-mediation disclosures pursuant to the Court's February 3, 2020 Order in FLSA Case (Dkt. No. 10).

Dated: New York, New York
February 26, 2021

KATZ MELINGER PLLC

By: /s/ Katherine Morales
Katherine Morales
280 Madison Avenue, Suite 600
New York, New York 10016
Telephone: (212) 460-0047
Facsimile: (212) 428-6811
kymorales@katzmelinger.com
Attorneys for Plaintiffs